REMARKS/ARGUMENTS

The application has been amended in response to more clearly describe the present

inventions. The pending and amended claims overcome the rejections of claims 1, 2 and 4-31

based on the applied references. No new matter has been added.

PENDING REJECTIONS

Claims 1-2, 4-8, 10, 13-20, 22 and 25-30 stand rejected under 35 U.S.C. §102(e) as

allegedly being unpatentable over Eynard *et al.* (U.S. Publication No. 2002/0174050) in view of

Araujo *et al.* (U.S. Publication No. 2003/0191799).

Claims 9 and 21 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentable

over Eynard *et al.*, in view of Araujo *et al.*, further in view of Hanzek (U.S. Patent No.

6,654,726).

Claims 11-12 and 23-24 stand rejected under 35 U.S.C. §103(a) as allegedly being

unpatentable over Eynard *et al.*, in view of Araujo *et al.*, further in view of Nwabueze (U.S.

Publication No. 2002/0144174).

Claim 31 stands rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over

Eynard *et al.*, in view of Araujo *et al.*, further in view of Nwabueze.

REJECTIONS UNDER 35 U.S.C. § 103

Applicants respectfully disagree with the propriety of the rejections proposed by the

Office Action for independent claims 1, 13, 25 and 27. Specifically, independent claims 1, 13,

25 and 27 each recite the ability of a user to "remotely manipulate or modify at least one report."

Applicants respectfully submits that Eynard *et al.* does not teach or suggest any feature or

functionality that enables a user to remotely manipulate or modify at least one report, as recited

in amended claims 1, 13, 25 and 27.

For example, the excerpt from Eynard *et al.* alleged by the Examiner to disclose such a

feature merely discloses the hardware associated with a business capacity transaction

management system, but fails to disclose any feature of functionality that "remotely manipulates

or modifies at least one report":

> [0019] A business capacity transaction management (BCTM) system of the present invention may include hardware and software and suitably implements several networked computer information technologies. Networked computer information technologies include, inter alia, the technologies for programmable computers (e.g., architecture, circuits, memory and caching, bus sharing, processor instruction sets, etc.), operating systems (e.g., multitasking, interprocess communication, shadowed storage, etc.), database management systems (e.g., query languages, physical schemes for efficient file and record searching and retrieval), and network management (e.g., protocols of the type described by the Open Systems Interconnection (OSI) model, packet switching, routing, distributed storage arrangements, object request brokering, server architectures, etc.). A computer system according to various aspects of the present invention includes any suitable combination of these technologies (e.g., a conventional corporate intranet providing access to the Internet and to portable computers via wireless network links) programmed to perform methods as discussed below. For example, system 100 of FIG. 1 includes server 102 (representing any number of servers), network 103 (representing any logical or physical topology), and clients 104, 105, and 106 (representing any number of clients).

See Eynard *et al.*, Page 2, ¶ 0019. Applicants are perplexed at how the above excerpt is deemed

to teach or suggest any feature or functionality that enables a user to remotely manipulate or

modify at least one report, as recited in independent claims 1, 13, 25 and 27.

Other excerpts relied upon by the Examiner in the Office Action are similarly deficient:

> [0032] Client 104 (representative of any client of system 100) may be implemented according to the functional block diagram of FIG. 2. Client 104, of FIG. 2, includes user software 124 having Browse process 202, Communicate-per-protocols process 204, Transfer-files process 206, Edit-files process 208, and user data 210. Browse process 202 and Communicate process 204 include all functions as described above with reference to Browse process 142 and

Communicate process 140. Commands provided to network 103 by Communicate process 204 may conform to one or more protocols, preferably HTTP and TCP/IP for operation on the Internet. Replies received from network 103 may conform to any protocol (and may be initiated by any client or server in the absence of a command from process 204, e.g., a probe or notification). Replies preferably conform to XML and/or HTML and may have embedded software to be interpreted, referenced, or performed by client 104 (e.g., an applet, script, class library, DTD, DLL, or EXE written in JAVA, PEARL, data, or executable code). Some or all client functions may be performed by one or more automated processes (e.g., for user-defmed scheduled or threshold-activated interactions), not shown; and, may be implemented using conventional application program interface (API) technologies.

See Eynard *et al.*, Page 3, ¶ 0032.

[0035] User data 210 (corresponding in full or in part to client data 144) may include any conventional structures, for example, pages (cached in XML or HTML), cookies (e.g., saving configuration or preference information between sessions), applets, scripts, dictionaries (e.g., XML DTDs), local boxes for email and other messaging functions, configuration details (e.g., .INI files), local file copies (e.g., downloaded information to be used off-line), class libraries (e.g., for use by a JAVA interpreter in performing an applet), and DLLs (e.g., objects that may be brokered using DCOM). The structure and functions of user data 210 and related portions of BCTMS 101 are of the type described in "Webmaster in a Nutshell" by Stephen Spainhour and Valerie Quercia, published by O'Reilly and incorporated herein by reference.

See Eynard *et al.*, Page 4, ¶ 0035.

[0037] For a better understanding of the cooperation of management processes 302-318, node data 116 is described in FIGS. 3A, 3B, 3C, and 3D as comprising groups of data files (and supporting indexes, not shown). Each file group is primarily (and, importantly, not exclusively) used by one of the management processes discussed above. File group 332 includes SERVERS file, SESSIONS file, PREREQUISITES file, and CONSEQUENCES file for use by Manage-foundation-services process 302. File group 334 includes DEFAULTS file, ALLOWANCES file, PREFERENCES file, PAGE-ELEMENT-PRIORITY file, PAGE_ELEMENTS file, PAGE-RULE file, PAGE_LAYOUT_RULES file, FAQS file, HELPS file, and TUTORIALS file for use by Manage-presentation-services process 304. File group 336 includes BOXES file, BOX_ACTIONS file, DISCUSSIONS file, and MESSAGES file for use by Manage-mail-services process 306. File group 338 includes USERS file, USER-ENTITY file, ENTITY_DESCRIPTORS file, ENTITY-ENTITY_DESCRIPTOR file, and ENTITY-CAPACITY-STATED_VALUE file for use by Manage-member-services process 308. File group 340 includes ENTITY-PROJECT file, PROJECTS file, PROJECT-STEP-MATERIAL file, PROJECT-STEP-

CONTROL file, and PROJECT-STEP-MECHANISM file for use by Manage-project-services process 310. File group 342 includes ACCOUNTS file, TERMS file, DRAFT_AGREE file, and ARCHIVED_AGREE file for use by Manage-commitment-services process 312. File group 344 includes APPROVALS file, FINDINGS file, STUDIES file, and RISK_ASSAY_RULES file for use by Manage-evaluation-services process 314. File group 346 includes GROUPS file, GROUP_PURPOSE_FORMS file, and GROUP-MEMBER file for use by Manage-group-services process 316. File group 348 includes INVITES_TO_OFFER file, AUCTIONS file, BIDS file, and TRANSACTIONS file for use by Manage-market-services process 318.

See Eynard *et al.*, Page 4, ¶ 0037.

Therefore, Applicants respectfully submit that -- as evidenced by the above excerpts -- Eynard *et al.* does not teach or suggest any feature or functionality relating to the remote manipulation or modification of at least one report, as recited in each of the pending independent claims. In fact, Applicants respectfully submit that Eynard *et al.* is not analogous art to the claimed systems and methods because it merely relates to a system that "facilitates the description of new goods and/or services being offered for exchange in terms developed by a trading community that are recognized in that trading community as commercially reasonable and facilitates user-defined qualifications for various limits to bring about further or different cooperation amount the system's users." As such, Eynard *et al.* does not teach or suggest any feature or functionality that even remotely relates to the claimed systems and methods.

Applicants respectfully submit that in view of the above remarks regarding the rejections under §103, claims 1, 13, 25 and 27 are now allowable over the cited prior art. Each remaining claim depends from either independent claim 1, 13, 25 or 27 and is therefore allowable over the art of record for at least the reasons set forth above.

CONCLUSION

Since the cited references, taken either singly or in combination, fail to teach or suggest the combinations set forth in the pending claims, and further fail to provide any motivation or suggestion of the desirability of modifying the structures or methods to arrive at the claimed combinations, Applicants submit that the pending claims are allowable over the cited references. Accordingly, Applicants respectfully request that the Examiner withdraw his rejections, allow the pending claims and pass the application to issue.

If the Examiner believes that a telephone conference or interview would advance prosecution of this application in any manner, the undersigned stands ready to conduct such a conference at the convenience of the Examiner.

If there are any fees due under 37 C.F.R. §1.116 or §1.117 which are not enclosed herewith, including any fees required for extension of time under 37 C.F.R. §1.136, please charge such fees to our Deposit Account No. 50-0206.

Respectfully submitted,

HUNTON & WILLIAMS, LLP

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